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August 22, 2024

**VIA ECF**

Honorable Judge Jennifer E. Willis, U.S.M.J.  
United States District Court  
Southern District of New York  
40 Foley Square, Room 425  
New York, New York 10007

Re: *Brockmole, et al. v. EZ Festivals LLC, et al.*  
*Avchukov, et al. v. Avant Gardner LLC, et al.*  
*Palie, et al. v. EZ Festivals LLC, et al.*  
*Ting, et al. v. Avant Gardner LLC, et al.*  
Civil Action No.: 1:23-cv-08106 (MMG)(JW) (Consolidated)

Dear Judge Willis:

Our law firm represents plaintiffs Nicole Brockmole, Lauren Bair, and Nicholas Ercklentz (the “Brockmole Plaintiffs”) in the above-referenced matter.

Pursuant to Rule I.G. of Your Honor’s Individual Practices, we write on consent of Defendants Gardner Purchaser LLC, Stewart Purchaser LLC, WRE Holding AG, WRE MANAGEMENT LLC, WRE Parent US Holding Corp. Inc., Phillip Wiederkehr, and Wiederkehr Associates (collectively “Defendants”) to respectfully request an extension of time for the Brockmole Plaintiffs to oppose or otherwise respond to Defendants’ motion to dismiss (ECF No. 107-109) until **September 10, 2024**. The Brockmole Plaintiffs further request Defendants time to reply be extended until **October 1, 2024**.

This is the Brockmole Plaintiffs’ first request for an extension of their time to oppose or otherwise respond to Defendants’ motion to dismiss. As noted, counsel for Defendants’ consent to this extension. The requested extension will not affect any other scheduled dates in this matter.

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We appreciate the Court's consideration of this request.

Respectfully,

A handwritten signature in black ink, appearing to read "Lee Squitieri", with a long horizontal flourish extending to the right.

Lee Squitieri

LS:mm